



September 15, 2020

U.S. Environmental Protection Agency

Re: Freedom of Information Act Request;
West Lake Verret Oil and Gas Field, St. Martin Parish, Louisiana

Dear Records Custodian,

This is a Freedom of Information Act (FOIA) request submitted to the U.S. Environmental Protection Agency (EPA). This request is limited to oil and gas exploration and production activities conducted by Shell Oil Company in the West Lake Verret Oil and Gas Field, located in St. Martin Parish, Louisiana. This FOIA request hereby specifically includes a request for emails that pertain to the topics listed below. I request that a copy of the documents listed below, or documents containing the following information, be provided to me.

1. Any and all documents related to communications between EPA personnel and Shell Oil Company, their representatives, consultants, or personnel regarding Shell Oil Company's oil and gas exploration and production activities in the West Lake Verret Oil and Gas Field.
2. Any and all documents related to communications between EPA personnel and Shell Oil Company, their representatives, consultants, or personnel regarding any remediation, cleanup, restoration, assessment, inspection, or sampling activities conducted by Shell Oil Company, their representatives, consultants, or personnel in the West Lake Verret Oil and Gas Field. This request includes any and all subject documents whether proposed, submitted, implemented, completed, or abandoned, prepared by or on behalf of Shell Oil Company in connection with its EPA-regulated activities in the West Lake Verret Oil and Gas Field.
3. Any and all documents regarding any remediation, cleanup, restoration, assessment, inspection, or sampling activities, whether proposed, implemented, completed, or abandoned, relating to oil and gas operations conducted by Shell Oil Company in the West Lake Verret Oil and Gas Field.
4. Any data, sampling, or testing performed in connection with any remediation, assessment, sampling plans, or proposals conducted by or on behalf of Shell Oil Company in connection with its EPA-regulated activities in the West Lake Verret Oil and Gas Field.
5. Any and all documents related to the methodology used or proposed for use in any remediation project conducted by or on behalf of Shell Oil Company in connection with its EPA-regulated activities in the West Lake Verret Oil and Gas Field.
6. Any and all documents related to the cost of any remediation project conducted by or on behalf of Shell Oil Company in connection with its EPA-regulated activities in the West Lake Verret Oil and Gas Field.
7. Any and all documents related to oil and gas exploration and production operations conducted by Shell Oil Company in the West Lake Verret Oil and Gas Field.
8. Any and all documents related to observations, inspections, and investigations made by EPA personnel regarding the historical or existing facilities operated by Shell Oil Company in the West Lake Verret Oil and Gas Field.

9. Any and all documents related to observations, inspections, and investigations made by EPA personnel regarding the environmental conditions at facilities operated by Shell Oil Company in the West Lake Verret Oil and Gas Field.
10. Any and all documents related to violations, compliance orders, or other enforcement actions taken in connection with oil and gas operations conducted by Shell Oil Company in the West Lake Verret Oil and Gas Field.

The term "document" shall mean any written, electronic, printed, non-printed, typed, photocopied, photographic, reproduced or graphic matter of any kind or character, and any recorded or stored information, however produced or reproduced, including (without limiting the generality of the foregoing), affidavits, agreements, books, calendars, communications, contracts, correspondence, desk pads, diaries, diary or calendar entries, interim or tentative drafts, journals and journal entries, ledger and ledger entries, lists, memoranda, minutes and minute entries, notes, photographs, print-outs, records of meetings, conferences and telephone or other conferences, conversations or communications, reports, statements, studies, telegrams, telexes, electronic mail, printed copies of electronic mail, teletypes and/or work papers, x-rays and information stored in computers or other data storage or processing equipment, or in magnetic or electronic media, microfilm or microfiche or other form which can be retrieved or printed out or reduced to readable form through proper programming, decoding or processing, together with necessary instructions for understanding, using or reproducing same. The term "document" includes originals and all copies of documents containing notes, notations, comments, observations, remarks, underscoring, marks made for emphasis, highlighting, or encircling, relating or referring in any way to the subject matter of these requests.

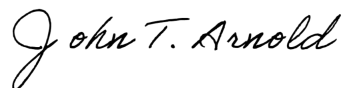
I am willing to pay fees for this request up to a maximum of \$1,000.00. If you estimate that the fees will exceed this limit, please inform me prior to processing the request.

I request that the information I seek be provided in electronic format, and I would like to receive it on a personal computer disk.

Also, if in replying to this request you must withhold any information, please let me know the general nature of the information withheld and the basis for withholding it. If you have any questions, please feel free to call me at 225-229-8802 or email me at jarnold@jonesswanson.com

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in cursive script that reads "John T. Arnold".

John T. Arnold